

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF MARYLAND**

**Lorraine Baker-Booser
3806 Envision Terrace
Bowie, MD 20716**

Plaintiff,

v.

**Ford Motor Credit Company
PO Box 3076
Columbia, MD 21045**

Defendant.

Case No.

AW 05CV1245

**FILED ENTERED
LODGED RECEIVED**

MAY 9 - 2005

**AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND**

BY

DEPUTY

COMPLAINT

Plaintiff, through undersigned counsel, sues Defendant, Ford Motor Credit Company, and for causes of action respectfully states as follows

1. Jurisdiction is proper in this Court because Plaintiff, herein after Lorraine Baker-Booser brings forth a cause of action under the Fair Debt and Collection Practices Act. (FDCPA) (15 U.S.C.A. §1692).

2. Venue is proper in this Court because Defendant, herein after Ford Motor Company Credit is a nationwide corporation who does business in Maryland and Plaintiff resides in Southern District of Maryland.

3. Ford Motor Company Credit entered into a contract with Plaintiff to finance the purchase of her 2002 Ford Expedition in the Summer of 2002

4. As of November 2004 the payoff balance on the Ford Expedition was approximately thirteen thousand dollars (\$13,000.00).

5. Ms. Baker-Booser had diligently made payments on the vehicle for three and a half years.

6. On October 20, 2004, Ms. Shaw, a debt collector employed by, or contracting with, Ford Motor Credit threatened Ms. Baker Booser with incarceration if she did not make payment on her Ford Motor Credit debt.

7. Ms. Shaw misrepresented herself as someone who would be able to obtain an arrest warrant for Ms. Baker-Booser as a consequence for not making all of her payments in a timely manner.

8. Specifically, Ms. Shaw threatened Ms. Baker Booser that if she did not make a \$1000 payment towards the default on her vehicle, then Ford Motor Company Credit would then put a warrant out for her arrest, and come to Ms. Baker-Booser's place of employment to lock her up.

9. From October 20th to October 21st 2004 Ms. Shaw made a total of six (6) threatening phone calls to Ms. Baker-Booser at her home and workplace.

10. As a result of Ms. Shaw threats, Ms. Baker-Booser paid Ford Motor Credit \$1000.00.

11. From the 29th of October to the 2nd of November, 2004, Ms. Shaw made five (5) more phone calls. On November 2nd Ms. Baker-Booser informed Ms. Shaw that she had retained counsel and that Ms. Shaw should no longer speak to her.

12. On November 15, 2004 Ms. Shaw, aware that Ms. Baker-Booser was represented by counsel, made another phone call to Ms. Baker-Booser.

13. Ms. Shaw also contacted a third party, Ms. Dorretha Ginyard a friend of Ms. Baker-Booser and spoke to her regarding the debt while making similar threats..

4. As a result of the improper collection method and tactics employed by Ford Motor Credit's employee and/or contract debt collector Ms. Shaw, Ms. Baker-Booser suffered emotional distress. Ms. Baker-Booser lived in fear of being arrested, and feared going to work because she thought that Ms. Shaw had the power to seek her arrest at her place of employment.

WHEREFORE the Plaintiff demands judgment in the amount of \$ 5,000.00 in actual damages, \$1000.00 in statutory damages plus attorney's fees

I, Lorraine Baker-Booser, affirm under the penalties of perjury that the foregoing is true to the best of my knowledge, information and belief.

_____/s/ Lorraine Baker-Booser
Lorraine Baker-Booser

Respectfully submitted,

By: ____/s/ Matthew Hertz____
____/s/ Brett E. Cohen____
Matthew Hertz, Esquire
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